

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

FILED
LODGED
ENTERED
RECEIVED

DEC 22 2022 RE

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

Janette Harrison
(AKA Jeanette Harrison)

CASE NO. 2:22-cv-01811-RAJ
[to be filled in by Clerk's Office]

COMPLAINT FOR A CIVIL CASE

Jury Trial: Yes No

Plaintiff(s),

v.

University of Washington

Gino Aisenberg; Tomitha Blake

Gary Ferris; Dave Eaton; Lisa Hanna

Mindy Kornberg; Beth Louise; Erin Rice

Dan Peterson Defendant(s).

Joy Williamson-Lott

I. THE PARTIES TO THIS COMPLAINT

A. Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Janette Harrison (AKA Jeanette Harrison)

Street Address

7320-32nd Avenue South

City and County

Seattle, WA King County

State and Zip Code

Washington 98118

Telephone Number

206-310-6085

Defendants

Defendant #5

Mindy Kornberg
Vice President, UW Human Resources
UW, Human Resources, Box 354960
Seattle; King County
Washington; 98105-4960
206-685-4739

Defendant #6

Beth Louie
Investigation & Resolution Specialist
UW Compliance Service Department
University Complaint Investigation
and Resolution Office
UW, Box 354996
Seattle; King County
Washington; 98105-4996
206-616-7108

Defendant #7

Erin Rice, Assistant Vice President
PRBS: Human Resources.
UW, Campus HR Operations and
Services, Box 354963-4963
Seattle; King County
Washington; 98105-4963
206-543-2354 & 206-897-1670

Defendants

Defendant #8

Dan Peterson
Retired Vice President of
Development; UW Foundation

Defendant #9 Joy Williamson-Lott

Graduate School Dean
UW, Box 353770
Seattle, King County
Washington; 98105-3770

Defendant #10

Julie Brown
Associate Vice President, Operating
& Budget Officer, Pres;
University Advancement
UW, Box 359504
433 Brooklyn Avenue NE
Seattle, King County
Washington; 98105-9504

B. Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name Cindi Aisenberg; Former Graduate School Associate Dean;
Job or Title (if known) UW - School of Social Work, Box 354900
Street Address Seattle; King County
City and County Washington 98195-4900
State and Zip Code 206-616-9365
Telephone Number

Defendant No. 2

Name Tomitha Blake; Assst. Vice Provost
Job or Title (if known) Advancement/constituency
Street Address UW - Gerberding Gerberding Hall
Box 351210
City and County Seattle; King County
State and Zip Code Washington 98195-1210
Telephone Number 206-521-6063

Defendant No. 3

Name GARY FARRELL; Former Executive
Job or Title (if known) Director of Finance Director, Graduate
School, Associate Dean, Finance
Street Address & Resources; School of Dentistry
UW 3533 UW Box 356365
City and County Seattle; King County
State and Zip Code Washington 98105-6365
Telephone Number 206-616-9158

1 Defendant No. 4

2 Name

3 Job or Title (if known)

4 Street Address

5 City and County

6 State and Zip Code

7 Telephone Number

Lisa Hanna, Director, Employee
Relations' HR, Campus HR Operations

Civil Services

UW, Campus HR, Box 354963

Seattle, King County

Washington, 98105-4963

206-543-2354 & 206-685-7575

II. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)



Federal question

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States

Constitution that are at issue in this case.

① Breach of contract; Employment discrimination

② Wrongful termination; ^④ Unsafe workplace conditions;

⑤ Misclassification; ^③ Retaliation; ^⑦ Workplace injuries

⑥ Violation of civil rights

1 B. If the Basis for Jurisdiction Is Diversity of Citizenship

2 1. The Plaintiff(s)

3 a. If the plaintiff is an individual.

4 The plaintiff (name) Janette (Jeanette) Harrison, is a citizen of the
5 State of (name) Washington.

6 b. If the plaintiff is a corporation.

7 The plaintiff, (name) University of Washington, is incorporated under
8 the laws of the State of (name) University of Washington, is incorporated under
9 the laws of the State of (name) University of Washington, and has its principal
10 place of business in the State of (name) Washington state.

11 (If more than one plaintiff is named in the complaint, attach an additional page providing
the same information for each additional plaintiff.)

12 13 2. The Defendant(s) University of Washington and more.
Please see attached list.

14 a. If the defendant is an individual.

15 The defendant, (name) _____, is a citizen of the
16 State of (name) N/A. Or is a citizen of
17 (foreign nation) _____.

18 b. If the defendant is a corporation.

19 The defendant, (name) University of Washington, is incorporated under
20 the laws of the State of (name) Washington state, and has its principal
21 place of business in the State of (name) Washington state.

22 Or is incorporated under the laws of (foreign nation) N/A,
23 and has its principal place of business in (name) N/A.

24 (If more than one defendant is named in the complaint, attach an additional page
providing the same information for each additional defendant.)

3. The Amount in Controversy.

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*):

Working at UW was won. I worked smart and hard; giving my best everyday. The stress and strain on my body at a cellular level remains. Falling down a flight of stairs, because I wasnt provided a suitable workspace per the Family Educational Rights and Privacy Act, I have injuries needing physical therapy for the rest of my life to stay healthy as I age. thus, I'm requesting \$15 million.

III. STATEMENT OF CLAIM

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought.

State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

statement of each claim in a separate paragraph. Attach additional pages if needed.

A few months short of working at the University of Washington (UW) for 15 years, I was forced to resign. This resignation ended a 4 year battle to receive an equitable salary and opportunities, retroactive pay and safe work conditions and cell phone reimbursements.

Throughout this time, I shared these challenges / obstacles w/ UW leaders in numerous departments, including HR, Advancement, Diversity Equity & Inclusion, Graduate School and University Complaint Investigation and Resolution Office. Unfortunately, my efforts didn't help. I was labeled a problem and lost my job.

Workplace injuries/bestment failure to pay cell reimbursement
loss/misclassification of salary, savings & investments

V. CERTIFICATION AND CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper

1 purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;

2 (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or

3 reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so

4 identified, will likely have evidentiary support after a reasonable opportunity for further

5 investigation or discovery; and (4) the complaint otherwise complies with the requirements of

6 Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

10 Date of signing: December 21, 2022
11 Signature of Plaintiff Janette (Janette) Harrison
12 Printed Name of Plaintiff Janette (Janette) Harrison

14 Date of signing: _____
15 Signature of Plaintiff _____ N/A
16 Printed Name of Plaintiff _____

18 Date of signing: _____
19 Signature of Plaintiff _____
20 Printed Name of Plaintiff _____

UNITED STATES DISTRICT COURT

Western District of Washington

*Janette Harrison
AKA Jeanette Harrison*

Plaintiff

vs.

*University of Washington
Givio Aisenberg; Tomatha Blake
WaveEaton; Gail Farries; Lisa Hanna*

Defendant(s)

Case Number: _____

**DECLARATION AND APPLICATION
TO PROCEED IN FORMA PAUPERIS
AND WRITTEN CONSENT FOR
PAYMENT OF COSTS**
DECLARATION AND APPLICATION TO PROCEED IN FORMA PAUPERIS

I (print your name) Janette Harrison declare I am the plaintiff in this case; I believe I am entitled to relief; and I am unable to pay the costs of this proceeding or give security therefor. The nature of my action is briefly stated as follows:

FILED
LODGED

ENTERED
RECEIVED

DEC 22 2022 RE

In support of this application, I answer *all* of the following questions:

BY AT SEATTLE CLERK U.S. DISTRICT COURT WESTERN DISTRICT OF WASHINGTON DEPUTY

1. Are you presently employed?

Yes Total amount of net monthly salary (take home pay) \$ N/A

Name and address of employer N/A

No Date of last employment 7/29/22 Total amount of last net monthly salary \$ 16,507.83

2. If married, is your spouse presently employed? Not married

Yes Total amount of spouse's net monthly salary (take home pay) \$ N/A
Name and address of employer Everett Housing Authority, 3107 Colby Avenue
Everett, WA 98201

No Date of spouse's last employment N/A Total amount of last net monthly salary \$ N/A

3. For the past twelve months, list the amount of money you and/or your spouse have received from any of the following sources.

- | | |
|--|---------------------|
| a. Business, profession or other self-employment | \$ <u>23,000.00</u> |
| b. Income from rent, interest or dividends | \$ <u>0</u> |
| c. Pensions, annuities or life insurance payments | \$ <u>0</u> |
| d. Disability, unemployment, workers compensation or public assistance | \$ <u>0</u> |
| e. Gifts or inheritances | \$ <u>0</u> |
| f. Money received from child support or alimony | \$ <u>0</u> |
| g. Describe any other source of income | <u>0</u> |

4. List the amount for each of the following for you and/or your spouse:

Cash on hand \$ 15,00

Checking Account \$ 70.00

Savings Account \$ 0

5. Do you and/or your spouse own or have any interest in any real estate, stocks, bonds, notes, retirement plans, automobiles, or other valuable property (excluding ordinary household furnishings and clothing)? If Yes, describe the property and state its approximate value:

Yes

No

N/A

\$

N/A

6. Are any persons dependent upon you or your spouse for support? If Yes, state their relationship to you or your spouse, and indicate how much is contributed toward their support each month. (Do not include names of minor children.)

Yes

No

N/A

\$

N/A

7. Describe the types of monthly expenses you incur, such as housing, transportation, utilities, loan payments, or other regular monthly expenses and the amount spent each month.

*Mortgage; house insurance; transportation;
Electric and H2O; phone & internet*

\$

5,410

8. Provide any other information that will help explain why you cannot pay court fees and costs.

*Currently I am unemployed with zero income
while looking for full time work.*

I declare under penalty of perjury that the foregoing is true and correct.

12/22/2022 Janette Harrison (Janette Harrison)

Executed on: (Date)

Signature of Plaintiff (Required)

WRITTEN CONSENT FOR PAYMENT OF COSTS UNDER LOCAL RULE CR3(c)

I, (print your name) Janette Harrison (AKA Jeannette Harrison)

hereby consent that any recovery in damages that I may receive in the above-captioned cause may be reduced, if so directed by the court, in such an amount as is necessary for payment of the unpaid fees and costs which are taxed against me in the course of this litigation.

12/22/2022

Janette Harrison (Janette Harrison)

Executed on: (Date)

Signature of Plaintiff (Required)